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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 *****

11 PAMELA DITTMAR,
12
13 Plaintiff,

14 v.

15 CITY OF NORTH LAS VEGAS, a municipal
16 corporation,
17 Defendant.

Case No. 2:17-cv-02916-JAD-BNW

**STIPULATION TO EXTEND
DISPOSITIVE MOTION RESPONSE
AND REPLY DEADLINES & ORDER**

(Fifth Request)

ECF No. 98

18
19 NOW COMES the Plaintiff, Pamela Dittmar, by and through her attorneys, Melanie A.
20 Hill and Melanie Hill Law PLLC, and Defendant, City of North Las Vegas, by and through its
21 attorneys, R. Todd Creer, Kaitlin H. Paxton, and Kamer Zucker Abbott, who hereby stipulate that
22 the deadlines to file responses to the currently pending dispositive motions be extended from the
23 current deadline of June 11, 2021 up to and including June 25, 2021 and the deadline to file replies
24 be extended from the current deadline of July 2, 2021 up to and including July 16, 2021.

25 This is the fifth request for an extension of the dispositive motion deadline. The first request
26 was by stipulation to extend the dispositive motion deadline thirty (30) days from the extended
27 discovery cutoff deadline to complete the remaining two depositions. The second request was by
28 motion due to Plaintiff's counsel's ongoing illness with Covid-19 symptoms. The third request was

1 due to Plaintiff's counsel's immediate family member's emergency hospitalization for nearly one
2 week. The fourth request was due to Plaintiff's counsel's significant injuries from two separate
3 accidents. This Stipulation is made at the request of Plaintiff's counsel for the reasons set forth
4 herein and this is the fifth stipulation for an extension of the response and reply deadlines.

5 In support of this Stipulation and Order, the parties state as follows:

6 1. The current deadline to file dispositive motions is June 11, 2021. When the parties
7 first entered into a stipulation to extend the dispositive motion deadline, it was to extend the
8 dispositive motion deadline to thirty (30) days from the extended discovery cutoff deadline to
9 complete the remaining two depositions. When the parties next entered into a stipulation to extend
10 the dispositive motion deadline, it was to extend the dispositive motion deadline thirty (30) days
11 due to Plaintiff's counsel's ongoing illness with Covid-19 symptoms. The parties then entered into a
12 stipulation for an additional seven (7) days due to Plaintiff's counsel's family member's health
13 emergency. The parties then stipulated to extend the dispositive motion deadline due to Plaintiff's
14 counsel's significant injuries from two separate accidents.

15 2. Counsel for Plaintiff reached out to counsel for Defendant over a weeks ago to
16 inform them that she is still suffering injuries and pain from her accidents and needs to have
17 additional diagnostic tests and pain management and needs additional time from her original
18 estimate to treat and heal. Counsel for Plaintiff further informed counsel for Defendant that she had
19 to put her dog down a few weeks ago. Counsel for Plaintiff continues to be in significant pain from
20 her injuries and has continued to take a significant time off work to treat her injuries, attend physical
21 therapy, and recover necessitating this stipulation to extend the response and reply deadlines.

22 3. Defendant is sympathetic to Plaintiff's counsel's immediate health concerns and
23 recognizes the difficulties with the same. In that regard, Defendant has entered this stipulation so
24 long as it is not prejudiced in preparing its briefs so the parties have also agreed to extend the
25 response and reply deadlines for both parties.

26 4. The parties have agreed to extend the deadline to file responses to the dispositive
27 motions until June 25, 2021. The parties have further agreed that replies will be due on July 16,
28 2021. No other deadlines are being extended by this stipulation, such as the deadline for discovery

1 and to file a motion to compel written discovery.

2 5. This stipulation to extend the dispositive motion deadline is brought in good faith,
3 with a showing of good cause, and is not sought for any improper purpose or other purpose of
4 delay, but to allow counsel for the Plaintiff time off from work due to her injuries, allow her time
5 for treatment and physical therapy, seek additional diagnostic treatment and pain therapy, and time
6 to heal from her injuries. This extension will allow counsel for Plaintiff the additional time
7 necessary to do so prior to filing her response and reply.

8 WHEREFORE, the parties respectfully request by this stipulation that the Court extend
9 the deadline to file responses to the pending dispositive motions from the current deadline of June
10 11, 2021 up to and including June 25, 2021. The parties further request that the Court extend the
11 deadline to file replies to the dispositive motions from the current deadline of July 2, 2021 up to and
12 including July 16, 2021.

13 DATED this 8th day of June, 2021.

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15 MELANIE HILL LAW PLLC

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24 **IT IS SO ORDERED:**

25 
26 JENNIFER A. DORSEY
27 UNITED STATES DISTRICT JUDGE

28 Dated: 6-10-21